

**AIR LINE PILOTS ASSOCIATION, INTERNATIONAL**

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December 5, 2001 01 DEC 11 AM 11:40

Mr. Nicholas Sabatini  
Associate Administrator for Regulation and Certification  
Federal Aviation Administration, AVR-1  
10A, Room 1000W  
800 Independence Avenue, SW  
Washington, DC 20591

RE: Docket FAA 2001-11032 - 5

Dear Mr. Sabatini:

The Air Line Pilots Association, International (ALPA), representing the interests of 67,000 professional airline pilots flying for 47 airlines in the United States and Canada, has reviewed the cockpit door intrusion and penetration resistance standards proposed by the Air Transport Association (ATA). ALPA supports these more stringent standards for cockpit doors and acknowledges the need to proceed with this rulemaking initiative as quickly as practical. While we support the current ATA initiative, we feel it is appropriate and necessary to address other related flight deck security issues that will further improve the security and safety of the air transportation system.

In the ATA letter proposing the new standards, most references to applicability cover the entire fleet. Such a provision is consistent with the DOT Rapid Response Team's (RRT) recommendation to "...conduct a retrofit of the entire U.S. fleet of aircraft." However, the ATA letter suggests in one passage that the application of the standard be limited to FAR Part 121 passenger carrying aircraft. While it is true that the recent Aviation and Transportation Security Act mandates door improvements on passenger aircraft, there is certainly no prohibition from like improvements in the cargo fleet. In fact, the Act directs the Department of Transportation to "ensure the adequacy of security measures for the transportation of cargo." ALPA feels that security improvements are essential for all aircraft in airline service, regardless of size or mission.

In those instances where company employees are carried as passengers on cargo aircraft, they do so with far less scrutiny than fare-paying passengers in common carriage. Ramp areas for cargo operations are similarly less controlled than in typical passenger operations. In all of the discussions to date that have dealt with development of means to defeat attempts to commandeer an airliner, the concept of passenger intervention has been raised as part of the strategy. For cargo carriers, there is generally no possibility of such passenger intervention. All of these factors combine to actually increase the potential for a cargo aircraft to be targeted for hijacking.

Since a cargo aircraft used as a weapon represents the same risk as a passenger aircraft, we find it unacceptable to exclude this group of aircraft from consideration.

The ATA's proposal also makes reference to the possibility of smaller aircraft used in regular airline service being excluded. While ALPA recognizes that unique design circumstances must always be considered, we do not concur with blanket exclusion of any airline aircraft, regardless of size or mission. The industry acknowledges that every passenger boarding a small jet or turboprop deserves the same level of safety as they have when they board a larger airliner. It stands to reason then that their expectation of security must also be the same. The Aviation and Transportation Security Act acknowledges this premise with its direction to strengthen doors where a door is installed, not just on aircraft of a particular size or mission.

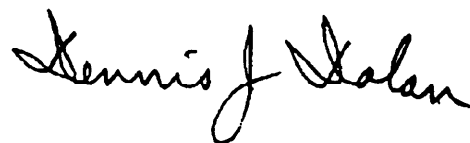
Clearly, it is well within the scope of the legislation and the intent of the RRT Recommendations to develop improved standards for flight deck doors on all aircraft in service under FAR Part 121. As ALPA has long advocated "One Level of Safety," we now advocate "One Level of Security" as an equally valid goal. If accommodations are made for a particular aircraft size or mission, they should be in the form of "tailored" compliance methods or timelines, not relaxed standards.

With respect to the standards, we agree that the proposed ballistic penetration standard will provide improved protection against hazards directed at the cockpit door itself. However, a ballistic resistant door surrounded by unimproved, unprotected bulkhead and floor areas does not represent a true barrier to ballistic penetration. The ARAC Design for Security Harmonization Working Group proposals upon which the standard is based correctly point out the need to protect flight critical systems, wherever they may be. Similar standards should be immediately developed to address penetration resistance of cockpit floors, ceilings, and bulkheads to protect such systems, where protection can be provided quickly and practically, again avoiding a blanket exclusion of protection.

To summarize, ALPA fully supports the development of improved security features for airline cockpit flight compartments. The ATA door standards for penetration and intrusion resistance are a good, initial step. We must continue, however, to address the fleet in a manner consistent with the RRT Recommendations and the Aviation and Transportation Security Act. It is incumbent upon industry and regulators alike to continue this effort, with additional rulemaking as necessary, and make sure that all aircraft operated under FAR Part 121 are protected, regardless of size, capacity, or mission.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, reading "Dennis J. Dolan". The signature is fluid and cursive, with the first name "Dennis" and last name "Dolan" clearly legible.

Captain Dennis J. Dolan  
Chairman, ALPA Security Task Force